

July 7, 2017

RECEIVED
FEDERAL ELECTION
COMMISSION

2017 JUL 10 PM 2:54

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

OFFICE OF GENERAL
COUNSEL

MUR # 7261

Dear Counsel:

I write to file a complaint against the Levi for Colorado Exploratory Committee for violation of Federal Election Law under the Commission's jurisdiction. It is clear that he has violated 11 CFR 100.72, the "testing the waters" provision of FEC law. Accordingly, his failure to file disclosure reports violates the law, and the Commission should demand full disclosure of Mr. Tilleman's campaign fund raising and expenditures, as well as penalize Mr. Tilleman for his willful violation of the law.

The language used on Mr. Tilleman's campaign website is beyond what is allowed under the FEC law. In the law it states that an individual is not allowed to campaign when exploring candidacy, and that campaigning is apparent when individuals, "make or authorize statements that refer to themselves as candidates" or "use general public political advertising to publicize their intention to campaign." Mr. Tilleman's campaign is doing just that in violation of the law.

For example, on his campaign website, Mr. Tilleman discusses what he will do if elected, "If I am elected, that is what I will fight for. I will fight for progressive causes. And I will fight for you." (Evidence D)

Also from his website, there is a quote referring to his election in the affirmative, "He'll be a powerful voice for veterans, families and the people of CD-6. As technology and automation transform our economy, Levi will fight to protect our workers and bring the jobs of the future to Colorado." (Evidence E)

On Twitter, Mr. Tilleman, in response to the Republican incumbent's spokesman "Coming for you next @tylersandberg #2018 #victory." As you will note, he is speaking about his hypothetical general election win. (Evidence C)

He has created several videos discussing his policy platform for which obvious funds were spent, which is also clearly not permissible under the law. All videos can be viewed on his Facebook page. Nowhere on said Facebook page does it mention that he is exploring a run. It simply states "Levi for Colorado." (Evidence B)

Lastly, and most importantly, Mr. Tilleman is now campaigning with paid Facebook ads. Under the "Testing the Waters" clause, a candidate is not allowed to pay for any advertising. His sponsored content is advertising recent press and his candidacy for Congress. (Evidence A)

It is clear that Mr. Tilleman has no regard for the law and he will be a liability to the Colorado Democratic Party. This is not how we do things in Colorado; we play within the rules. If he is serious about running for Congress in the 6th District, he should make a commitment to the people of Colorado's 6th district and explain his transgressions.

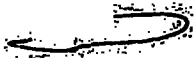
Respectfully,



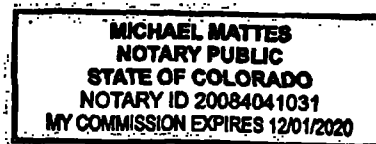
Patricia Ann Noonan
Former Arapahoe County Commissioner

State of Colorado County of Arapahoe

Subscribed and sworn to before me on this 7th day of July, 2017.



CK 12-01-2020



Evidence A:

Stuart Rosenberg and Ben Lazarus like: Levi for Colorado



Levi for Colorado

Sponsored · 4

Like Page

More great coverage on Levi!

"Levi Tillemann sure seems to turn heads. The Democratic political newcomer and energy expert isn't even a declared candidate yet in the 2018 race for Colorado's 6th Congressional District; he's only set up an exploratory committee as he considers a run against five-term Republican incumbent Mike Coffman. Yet, he has stirred media buzz"

<https://coloradopolitics.com/colorado-cd-6-prospect-levi-t.../>



Colorado CD-6 prospect Levi Tillemann gets a glowing review — in a Utah newspaper — Colorado Politics

Aurora Democrat Levi Tillemann is pictured with his uncle Justin on Elephant Butte near Evergreen in a family photo provided by his campaign. Tillemann announced...

[COLORADOPOLITICS.COM](https://coloradopolitics.com)

90

2 Comments 16 Shares

Like

Comment

Share

Evidence B:



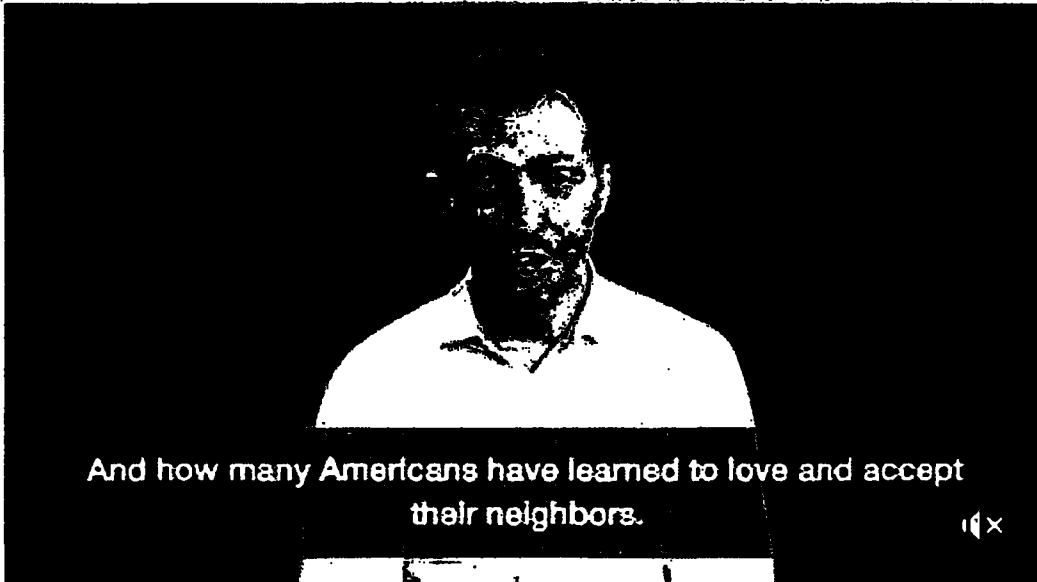
Levi for Colorado

June 17 at 7:18pm · 🌐

At Pride this weekend we will join arm in arm to celebrate the love we share and the progress we've made from Stonewall to Obergefell to today.

Standing together, we are a visible haven for kids, teens, and any others who may need to be reminded that they are not alone; moving forward together we will create a better tomorrow for all of us!

Happy Pride!!!... See More



Evidence C:



(((Levi Tillemann))) @levitd · 50m

Replying to @wtylersandberg @JasonCrowCO6

If you think that's "hot fire" @RepMikeCoffman's gonna have a bad time.
Coming for you next @wtylersandberg #2018 #victory.



2



1



2



Evidence D:

"We need a government that can build a better present without surrendering the future. If I am elected, that is what I will fight for. I will fight for progressive causes. And I will fight for you."

– Levi Tillemann

Evidence E:

communicator. He'll be a powerful voice for veterans, families and the people of CD-6. As technology and automation transform our economy, Levi will fight to protect our workers and bring the jobs of the future to Colorado.